

**AFFIDAVIT OF SPECIAL AGENT DAVID OFFUTT JR IN SUPPORT OF
AN APPLICATION FOR A CRIMINAL COMPLAINT**

I, Special Agent David Offutt Jr., of the Federal Bureau of Investigation (FBI), being duly sworn, hereby depose and state as follows:

1. I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant.

2. I have been employed as an FBI Special Agent since September 2017. I am assigned to the FBI office in Boston, Massachusetts (MA) where I work on the Violent Crimes Against Children (“VCAC”) Squad, which has responsibility for investigating violent federal criminal offenses including the coercion, enticement, and commercial sexual exploitation of children and adults. In addition, I received extensive training in federal criminal matters and investigative techniques while attending the New Agent Training at Quantico, Virginia and continue to receive training related to child exploitation matters through the FBI and our local partners.

3. I submit this affidavit in support of an application for a criminal complaint charging Keion J. ROWELL, YOB 1999, of Canton, MA, with Sex Trafficking of a Child, in violation of 18 U.S.C. §§ 1591(a)(1) & (b)(2) (the “Target Offense”).

4. The facts in this affidavit come from my personal observations and review of records, my training, experience, education, personal knowledge and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is probable cause to secure a criminal complaint and does not set forth all my knowledge about this matter. Where statements of others are set forth in this affidavit, they are set forth in substance and in part.

PROBABLE CAUSE

A. Recovery of the Minor

5. On January 28, 2021, the FBI and Boston Police Human Trafficking Unit, working with the Dedham Police Department (“DPD”), recovered a 15-year-old Minor female [hereinafter referred to as “the Minor”], who had been reported missing by her mother after she left her home in the suburbs of Boston where she resided with her father approximately 10 to 14 days previously.¹

6. On the date of the recovery, an anonymous tipster contacted the Minor’s mother. The Minor’s mother then contacted the FBI. The Minor’s mother was told to tell the anonymous tipster to set up a “date” for the Minor.²

7. At this time FBI agents communicated with the Minor in an undercover capacity and arranged a date at the Holiday Inn Boston-Dedham (“Holiday Inn”), located at 55 Ariadne Road, Dedham, MA. The tipster and law enforcement set up an undercover operation convincing the Minor that she would be meeting a customer or “john” to engage in commercial sex. At this point, the FBI and local law enforcement set up at the hotel until the Minor arrived. Upon arrival, agents observed two women standing near the hotel’s entrance talking on a cell phone. They were in fact talking with the Minor’s mother who was in a vehicle in the hotel parking lot.³

¹ I am aware the Minor’s parents are divorced and live in different locations. At the time of her disappearance, the Minor was in the primary custody of her father.

² I understand a “date” to mean commercial sex.

³ I know the names of, and interviewed, the women, and believe one or both of them was responsible for the anonymous tip. However, aside from the basis by which the investigation was initiated, I am not relying on their statements for the purpose of determining probable cause.

8. When the Minor arrived at the Holiday Inn, she was seen walking into the hotel. Your affiant followed the Minor into the elevator where she was then taken into protective custody by law enforcement. At the time, she was in possession of a cellular telephone.⁴ After obtaining consent to seize and search the phone from both the Minor and the Minor's mother, law enforcement took custody of the cellular telephone. Law enforcement obtained two federal search warrants, one for the phone recovered from the Minor and one for another phone recovered that day, under Case Numbers 21-MJ-2055-MBB and 21-MJ-2056-MBB, on February 4, 2021, before searching the cellular phones.

9. After executing the warrant on the Minor's phone, it had the following applications and information on it:

a) A Venmo account and payment information. The Venmo account was listed as @keion-ROWELL. According to records received from Venmo, that account was registered to "Keion ROWELL" with an email address of xxxxyian@gmail.com and a phone number xxx-xxx-0487. Both this number and email address have been linked to ROWELL.

b) A Cash App account that was associated with the phone that was recovered from the Minor, with ROWELL's social security number and date of birth in the Cash App registration information.

c) Multiple photographs. Some examples of the photographs were:

- i. selfies of the Minor;
- ii. pictures of a female in a bra and underwear; and
- iii. a frontal nude shot of a female's body.

⁴ One blue ONEPLUS Nord N100 phone in a black and maroon case.

d) Advertisements from websites such as classifiedads.com and kittyads.com.⁵ The classifiedads.com advertisements had pictures of the Minor.

10. After a brief interview, during which the Minor denied her identity and claimed not to recognize her own mother, the Minor was taken by ambulance to Boston Children's Hospital.

B. First Forensic interview of Minor

11. The Minor was interviewed by a forensic interviewer on two occasions. The summary of these interviews is listed below.

12. During the first interview the Minor stated that she stayed at home with Keion ROWELL and another individual known to law enforcement.

13. The Minor stated that she got money from people during the two weeks she was away but the Minor denied doing anything in exchange for the money.

C. Second Forensic Interview of Minor

14. Months later, the Minor sat down for a second forensic interview. During that interview the Minor told law enforcement the following information:

a) After the Minor ran from her father's home, the Minor went to meet another Minor (hereinafter, "Minor 2").⁶ However, the Minor's computer died, and the Minor was unable to contact Minor 2. The Minor then met a guy, later identified as "Skeem LNU," who appeared to be with a family member. The Minor went to Skeem's apartment and began to smoke. The Minor knew Skeem was on house arrest because Skeem had a bracelet on. The Minor and Skeem had sexual intercourse.

⁵I know that these websites feature advertisements for commercial sex.

⁶ Minor 2 is known to law enforcement.

b) After an overnight stay, Skeem said the Minor had to stay with someone else but couldn't stay overnight again. Skeem said the Minor was going to start making a lot of money selling herself and setting up an only fans page. Skeem reached out to several people telling them about the Minor and the Minor's potential to make money. Skeem ultimately reached out to ROWELL and ROWELL agreed to take the Minor in. Skeem drove the Minor to ROWELL.

c) When the Minor met ROWELL, ROWELL took the Minor to the basement⁷ and ROWELL showed the Minor how to set up a Meet Me page and how to post ads. Minor told ROWELL she was 18 years old and shortly thereafter ROWELL and the Minor had sexual intercourse. ROWELL told the Minor that she could stay the night with ROWELL.⁸ The Minor stated she "really liked [ROWELL], and I thought that it was, like, a relationship."

d) The next day, ROWELL told the Minor "If you wanna stay here, like, you need to contribute to something." The Minor believed that it was winter when she stayed at this house because it was really cold in there since they barely had heat in the house.⁹ ROWELL instructed the Minor to check the accounts¹⁰ that they had set up to see if anybody messaged her. Minor checked the accounts and said "mad people's text messaging me saying 'ahh we should meet up and do this and do that' this, that, and the third, and like, I had never, um, done something like that."

e) ROWELL told the Minor "how [she], like price things and, like, how much [she] should charge..." That night ROWELL told the Minor to make about \$200. That evening the Minor recalled "that's the first night that [she] sold [herself]..." She recalled thinking she could

⁷ I know the address of the location, which is in Boston, but omit it because I believe that other family members of ROWELL live there (hereinafter, the "Address").

⁸ Minor and ROWELL stayed together at the Address.

⁹ As stated previously, law enforcement recovered the Minor in January.

¹⁰ I believe that the Minor was referring to the advertisements, such as the kind described above.

do this. The Minor felt accomplished when she gave ROWELL the \$400. The second night the Minor only made around \$300 and ROWELL was upset she didn't make "[her]" cut of the money. The Minor said that ROWELL then stopped being close with her. For example, she said, it "stopped, like, we was like cuddling and everything, like he had me sleep with him, like, do a whole bunch of stuff that, like, made me think, like, we in a relationship." The Minor recalled being "in [her] head [thinking], in order to keep him, I have to sell myself "cause if I don't he's not gonna want [her]." ¹¹

f) At this point, the Minor's mother posted on Facebook about her missing. On this post, there was a photograph of the Minor with her age and description. ROWELL received a message and asked the Minor if the Facebook post was in fact the Minor. ROWELL also confronted the Minor about being 15 years old. The Minor initially denied the Facebook post was her and denied it was her mother. ROWELL then found a photograph of the Minor and her mother on Facebook and confronted the the Minor.

g) The Minor remembers ROWELL changing and no longer being upset because they "already fucked" and were "already making money," so she could just stay. The Minor continued to make money by selling herself every night, for approximately ten days.

h) The Minor recalled one day there was a bang to the door and saw police officers outside. The Minor woke ROWELL and told him the cops were at the house. The Minor crawled to the basement to avoid being caught and a relative of ROWELL ("Relative 1") answered the

¹¹ In my experience, ROWELL was "grooming" the Minor, which is a technique common among sex traffickers. Specifically, he was granting and withholding his affection as one of the means to cause her to engage in commercial sex for his benefit.

door. The police showed a picture of the Minor and Relative 1 said he didn't know that girl. Officers departed without the Minor.¹²

i) After the interaction with police, according to the Minor, she continued to take dates and make money.¹³ The Minor either gave that money to ROWELL directly via Cash App or Venmo, or to a witness known to the investigators, who gave it ROWELL. However, shortly after the police came to the house, the Minor recalled a relative of ROWELL ("Relative 2") came over because he was told the girl from the news was staying at the house. ROWELL told Relative 2 the Minor was only 15 years old, and the Minor recalled Relative 2 saying "yo, like, you about to fuck yourself up and when you get caught for this, I'm not gonna come bail your ass out of jail." Relative 2 told them they had to leave that day. After that occurred ROWELL and the Minor left the home.

j) Later that day, the Minor and ROWELL left the address and went to the house in Boston of a relative of ROWELL ("Relative 3").¹⁴ They stayed with Relative 3 for a short time and then relocated to a hotel. The Minor recalled the hotel cost about \$70 per night. At the same time ROWELL was continuously trying to book potential clients for the Minor. ROWELL told the Minor someone was going to pay a certain amount of money and was going to send a car service.¹⁵ The Minor recalled ROWELL pushing her to go on the date when the car service arrived. At this time, Minor "just got in the car and took [ROWELL's] jacket." The car took Minor into the hotel. At this time, Minor was recovered.

¹² I am aware that Boston Police in fact did go to that address attempting to find the Minor, after having "pinged" an IP address from the Minor's social media account coming from that address.

¹³ As described previously, law enforcement found Cash App and Venmo accounts linked to ROWELL on the Minor's phone.

¹⁴ The affiant knows the address as was previously mentioned in the affidavit.

¹⁵ This was an FBI undercover officer.

D. Conclusion

15. Based on the foregoing, I submit there is probable cause to believe that Keion ROWELL committed Sex Trafficking of a Child, in violation of 18 U.S.C. §§ 1591(a)(1) & (b)(2), in January 2021, in Suffolk County and elsewhere.

Respectfully submitted,



David Offut, Jr.
Special Agent
Federal Bureau of Investigation

Signed electronically and sworn before me on April 13 2022

Marianne B. Bowler, USMS
HON. MARIANNE B. BOWLER
UNITED STATES MAGISTRATE JUDGE

